



FORT WORTH ACADEMY OF FINE ARTS

January 8, 2015

Dear FCC,

Officers
Bill Lamkin
President

Ann E. Dunkin
President Elect

Michael W. Wellbaum
Secretary

Board of Directors
Edward Brown
Josh Coronado
Anne Cox
Sylvia Dodson
Willa Gill Dunleavy
Matthew D. Geske
Melissa Goodroe
Dr. Steven E. Johnson
Dr. Judith M. Kelly
Anne Miller

Executive Director
Clint Riley

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166
via Electronic Filing**

Dear Chairman Wheeler, Commissioners Clyburn, Rosenworcel, Pai, O'Rielly and Ms. Dortch,

On behalf of Fort Worth Academy of Fine Arts in Fort Worth, Texas, I write with concern about protection for our wireless microphones and backstage communications devices. We are a member of the Educational Theatre Association (EdTA), the national voice of theatre education that includes more than 5,000 educators and 90,000 student members. The mission of EdTA is to provide theatre education opportunities for all students.

Fort Worth Academy of Fine Arts presents 40 public performances a year, with more than 13,000 attendees annually. Our school theatre program relies on the revenue generated in these performances to sustain and grow our in- and after-school theatre education opportunities for all of our 525 third- twelfth grade students. Wireless microphones are a fundamental aspect of our program, and understanding how to use them a critical component of our educational pedagogy, both for student performers and technicians.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my school and thousands of others without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you are unaware of them.

Thousands of performances are held by both educational and professional performing arts organizations each year and the use of wireless microphones is essential to producing high-quality performances and also mitigates against significant public safety concerns

For Fort Worth Academy of Fine Arts:

- We use from 1-25 microphones for each performance, cue and control devices, and equipment controlling devices.
- All of our presentations use wireless devices - every public performance, as well as our daily assembly.
- We use low UHF (channels 14-36, 470 to 608 MHz)
- Our microphones are able to tune to more than one frequency and their tuning ability is 512-550 MHz
- All of our devices are analog.
- We own 14 wireless microphones and rent additional units as needed, depending on number of performers.
- Our equipment is obsolete at this point.
- We will have to purchase all new transmitters, receivers and antennas to get to the useable and allowable bandwidth.
- We expect that it will cost approximately \$24,000.00 to replace our current equipment.
- Depending on budgetary restraints, it will take from 3-5 years to replace our equipment

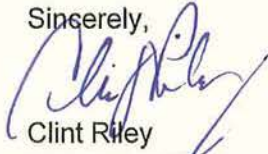
The FCC could reimburse the expense, as well as assure that the quality of the new devices would satisfy performance standards, as our moving to the useable and allowable bandwidth is solely dependant on funding.

As a public charter school, we depend on private funding and grants to provide sufficient funding over and above the current school budget, which is solely provided by Average Daily Attendance.

I appreciate that the Commission has sought comment on these very important issues. I realize that the FCC is seeking a fair and reasonable solution to the TV band issues we are now facing, but that solution should allow all organizations—big and small, professional and educational—that same sort of interference protection. The currently proposed plan offers no such protection for many of us. Further, I would request that the Commission consider the burden already borne by the educational and performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my school's sound equipment.

Theatre education programs are cornerstones of many schools cultural identity, nurturing 21st-century skills and knowledge for students and providing pride, entertainment, and dialogue in the communities, and contribute to the local economies. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse educational and performing arts organizations for the cost of new equipment prompted by any proposed spectrum move.

Sincerely,



Clint Riley
Executive Director